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November 15, 2019

BY ECF

Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Alexander Anderson v. New York City Health and Hospital Corp., et al.,
No. 16 Civ. 1051 (GBD) (KHP) (SDNY)

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. Defendants respectfully request a 60-day extension of time to submit their reply memorandum in further support of their motion for summary judgment from November 20, 2019 until January 21, 2020, which request is necessitated because the undersigned is leaving the New York City Law Department. Plaintiff consents to this request.

By way of background, on August 9, 2019, defendants filed their motion for summary judgment. (Docket Entry Nos. 168-173) By Order dated October 17, 2019, the Court granted plaintiff's request to file opposition papers by October 23, 2019 and for defendants to file reply papers by November 20, 2019. (Docket Entry No. 178) Since the Court's October 17, 2019 Order, I have given notice of my forthcoming departure from the Law Department, which is currently scheduled for November 26, 2019. To that end, I have been focused on transitioning assigned cases, as well as attending to completing case assignments before my departure. Although I had also hoped to complete defendants' reply papers in this case, I will not be able to do so by the November 20, 2019 deadline or before my scheduled departure date.

Accordingly, in light of the time it will take for a new attorney to familiarize him or herself with the record that involves multiple incidents and alleged failure to hire and promote spanning several years, the time it will take to draft reply papers in response to plaintiff's voluminous opposition papers, the attorney's pre-existing obligations, as well as the forthcoming holidays, defendants respectfully request a 60-day extension of time to file reply papers from November 20, 2019 until January 21, 2020.

Defendants thank the Court for the consideration herein.

Respectfully submitted,

/s/ Gary Moy
Gary Moy
Senior Counsel

cc: Delmas A. Costin (via ECF)
Attorney for Plaintiff

Defendant's deadline to submit their reply memorandum is hereby extended to December 20, 2019.

SO ORDERED:

Katharine H. Parker
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

11/18/2019